

**WARNING LETTER
AND
NOTICE OF AMENDMENT**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 6, 1997

Mr. J. W. Martinelli
President
Chevron Pipe Line Gas Company
4000 Executive Parkway
Bishop Ranch 8
San Ramon, CA 94583-0959

CPF No. 57001

Dear Mr. Martinelli:

On August 19-22, 1996, a representative of the Western Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an inspection of your facilities and records for the La Mirada natural gas transmission system owned and operated by Chevron Pipe Line Company (CPL).

As a result of the inspection, it appears that you have committed probable violations as noted below of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violations are:

1. **§192.625(f) Each operator shall conduct periodic sampling of combustible gases to assure the proper concentration of odorant in accordance with this section.**

At the time of the inspection CPL personnel could not produce documentation that would indicate compliance with the odorization requirements of 192.625

2. **§192.629 Purging of Pipelines (a) When a pipeline is being purged of air by use of gas, the gas must be released into one end of the line in a moderately rapid and continuous flow. If gas cannot be supplied in sufficient quantity to prevent the formation of a hazardous mixture of gas and air, a slug of inert gas must be released into the line before the gas.**

(b) When a pipeline is being purged of gas by use of air, the air must be released into one end of the line in a moderately rapid and continuous flow. If air cannot be supplied in sufficient quantity to prevent the formation of a hazardous mixture of gas and air, a slug of inert gas must be released into the line before the air.

At the time of the inspection, CPL's general procedures were inadequate in that they did not include specific detailed procedures addressing the requirements of 192.629.

3. **§192.743 Pressure limiting and regulating stations: Testing of relief devices.** (a) If feasible, pressure relief devices (except rupture discs) must be tested in place, at intervals not exceeding 15 months, but at least once each calendar year, to determine that they have enough capacity to limit the pressure on the facilities to which they are connected to the desired maximum pressure.

At the time of the inspection, CPL personnel could not produce documentation that would indicate CPL tested its relief valves during the calendar years 1994 and 1995.

Under 49 United States Code §60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations. We have reviewed the circumstances and supporting documentation involved for Items 1, and 3, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the probable violations, we will take enforcement action when and if the continued violation comes to our attention.

With respect to Items 2, as provided in 49 C.F.R. §190.237, this Notice serves as your notification that this office considers your procedures/plans inadequate.

Under 49 C.F.R. §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. §190.237.

page 3

Please refer to **CPF 57001** on any future correspondence.

Sincerely,

Edward J. Ondak
Director

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